

- IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
STATESBORO DIVISION**

and request additional time to respond. Plaintiff will fully supplement her responses to Defendants' requests for production when she receives complete responses from GCHC and GDOC.¹

3. Plaintiff will amend her initial disclosures to identify her expert witness and will furnish said expert's report to Defendants by January 29, 2017, as required by the Scheduling Order.
4. With Defendants' consent and cooperation, Plaintiff noticed the depositions of five non-party witnesses specifically identified in Defendants' responses to Plaintiff's interrogatories. These depositions are scheduled for February 9 and 10.
5. Plaintiff anticipates that she will seek further discovery including:
 - a. depositions of Defendants;
 - b. depositions of Defendants' expert witness[es] if designated; and
 - c. additional interrogatories, requests for production, non-party subpoenas for documents, and non-party depositions as the need may be determined based on the scheduled depositions, anticipated depositions, supplemental document productions, and anticipated subpoena responses.
6. Defendants anticipate they will seek further discovery including:

¹ Plaintiff's counsel has provided a courtesy copy of the partial production from GCHC.

- a. supplemental responses from Plaintiff to Defendants' interrogatories and requests for production;
- b. deposition of plaintiff;
- c. depositions of inmate and other witnesses identified in Plaintiff's discovery responses;
- d. depositions of Plaintiff's expert witness[es] as the need may be determined if designated;
- e. disclosure of Defendants' expert witness on or before March 15, 2017 as required by the Scheduling Order, as the need may be determined upon review of Plaintiff's expert witness disclosure;
- f. additional interrogatories, requests for production, requests for admission, non-party subpoenas for documents, and non-party depositions as the need may be determined based on the scheduled depositions, anticipated depositions, supplemental document productions, and anticipated subpoena responses.

This 27th day of January, 2017.

/s/ Sarah Geraghty

Gerald Weber
Georgia Bar No. 744878
Sarah Geraghty
Georgia Bar No. 291393
SOUTHERN CENTER FOR
HUMAN RIGHTS
83 Poplar Street, N.W.
Atlanta, Georgia 30303-1202
Telephone: (404) 688-1202
Facsimile: (404) 688-9440
gweber@schr.org
sgeraghty@schr.org

/s/ Daniel B. Millman

Lawrence J. Bracken II
Georgia Bar No. 073750
Jason M. Beach
Georgia Bar No. 043606
Daniel B. Millman
Georgia Bar No. 603728
HUNTON & WILLIAMS LLP
Bank of America Plaza, Suite
4100
600 Peachtree Street, N.E.
Atlanta, Georgia 30308-2216
Telephone: (404) 888-4000
Facsimile: (404) 888-4190
lbracken@hunton.com
jbeach@hunton.com
dmillman@hunton.com

Attorneys for Plaintiff

/s/ Roger A. Chalmers

Christopher M. Carr
Attorney General
Georgia Bar No. 112505
Kathleen M. Pacious
Deputy Attorney General
Georgia Bar No. 558555
Devon Orland
Senior Assistant Attorney General
Georgia Bar No. 554301
Roger A. Chalmers
Georgia Bar No. 118720
Assistant Attorney General
David S. Grossman
Assistant Attorney General
Georgia Bar No. 798341
State Law Department
40 Capitol Square, SW
Atlanta, GA 30334
Telephone: (404) 463-8850
Fax: (404) 651-5304
rchalmers@law.ga.gov
dgrossman@law.ga.gov

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on January 27, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of filing to all attorneys of record.

/s/ Daniel B. Millman
Counsel for Plaintiff